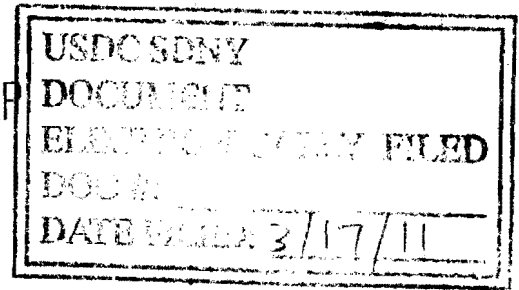


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March 16, 2011

VIA FEDERAL EXPRESS

Honorable Alvin K. Hellerstein, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street - Room 1050
New York, NY 10007

Re: In re September 11 Property Damage and Business Loss Litigation,
21 MC 101 (AKH)

Aegis Ins. Svcs. Inc., et al. v. 7 World Trade Center Co., LP, et al.
04-CV-7272

Dear Judge Hellerstein:

We represent the Consolidated Edison Company of New York, Inc., and the Aegis plaintiffs (collectively, "Con Edison") in the above-referenced matters.

Con Edison respectfully requests permission to supplement the record on the pending motions for summary judgment with the supplemental expert reports served by Con Edison on March 15, 2011, enclosed herewith in DVD format. These reports, totaling approximately 970 pages, are further detailed evidence of the existence of multiple disputed material issues of fact that preclude the granting of a motion for summary judgment, and will provide a full record, both for this Court or any potential reviewing Court, on this motion. We would not object to any request by defendants to supplement the record with the filing of their expert reports.

Respectfully,

Franklin M. Sachs

Enclosure

*motion to supplement
record is denied. No
showing has been made why the
information could not have been
supplied prior to 12/16/10, when agent
was heard, nor why the record should
be excused by duplication
hereof. The DVD is
returned to sender.
3/17/11*

Greenbaum Rowe
Smith & Davis LLP

Hon. Alvin K. Hellerstein, U.S.D.J.

March 16, 2011

Page 2

cc: Katherine L. Pringle, Esq. (w/o encl.)
Christopher P. Moore, Esq. (w/o encl.)

Judge said:

“Motion to supplement record is denied. No showing has been made why this information could not have been supplied prior to 12/16/10, when argument was heard, nor why the record should be encumbered by duplicative evidence. The DVD is returned to sender.”

3-17-11

Alvin K. Hellerstein”